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May 30, 2002

**CERTIFIED MAIL**

7099 3400 0002 6286 2743

Ms. Susan Roth  
6236 27<sup>th</sup> Avenue NE  
Seattle, WA 98115-7114

Dear Ms. Roth:

RE: The Proposed Final Bridge Document Report 1; Terminal 91 Tank Farm Site Agreed  
Order No. DE 98HW-N108

The Proposed Final Bridge Document Report 1, prepared for the Terminal 91 Site PLP Group by Roth Consulting, was received by the Department of Ecology (Ecology) on November 26, 2001. This work plan addresses the portion of the Port of Seattle (POS) Terminal-91 facility where RCRA corrective action is being performed pursuant to the Model Toxics Control Act Agreed Order No. DE 98HW-N108.

Ecology **approval** of the Proposed Final Bridge Document Report 1 (BDR#1) is based on the following:

1. Ecology's comments (enclosed) on BDR#1 will be satisfactorily addressed in Bridge Document Report 2.
2. Additional site work that is not identified in the approved Bridge Document Work Plan may be necessary at a later date.

Please proceed with the implementation of **Task 2—Bridge Document Report 2**, as described within the "Proposed Bridge Document Work Plan, Terminal 91 Tank Farm Site," which was submitted on October 15, 2000.

If you have any questions or comments, please contact me at the Department of Ecology Northwest Regional Office by phone at (425) 649-7280 or by email at [gtri461@ecy.wa.gov](mailto:gtri461@ecy.wa.gov).

Sincerely yours,

  
Galen H. Tritt  
Hazardous Waste and Toxics Reduction Program

GHT:ct

cc: Julie Sellick, Ecology-NWRO  
Ed Jones, Ecology-NWRO  
Michael Kuntz, Ecology-HQ-TCP  
Jan Palumbo, EPA Region 10  
HZW File 6.2

Enclosure



## COMMENTS ON BRIDGE DOCUMENT REPORT 1

### 1. Pathways

- Stated within this section are references to WAC 173-340-7491(1)(b) for institutional controls to ensure that the pathways to exposure are removed. Please clarify that the POS plans to use a restrictive covenant as described in WAC 173-340-440.

### 2. Screening Levels

- Selection of Potential Chemicals of Concern (COPCs). Although the historical data may include inaccurate contaminant concentrations (suspect data quality prior to April 1998), this data set should not be ignored for the purpose of identifying COPCs. That is, historical data should be used to determine if additional chemicals should be added to the list, especially since you are excluding chemicals if they were only detected during one event. In addition, if your excluded chemicals are detected in future events, they should be (re-) added to the list of COPCs.
- TCE was detected at a concentration 80 times below the assigned screening level, but it is likely that the level was based on old toxicological information. The screening value should be re-visited so that it is clear that the number represents the latest toxicological information.
- Based on a reading of Table 1, the following constituents were not assigned screening levels. If historical data are considered, would any of these be possible COPCs?
  1. Acetone\*
  2. Xylenes
  3. MIBK\*
  4. Cis-1,2-DCE
  5. 1,1-DCA
  6. chloroethane
  7. styrene\*
  8. vinyl acetate\*
  9. carbon disulfide\*
  10. dichlorodifluoromethane
  11. dibenzofuran
  12. benzyl alcohol\*
  13. phenanthrene
  14. 2,6-DNT\*
  15. 2-chloronaphthalene\*
  16. 2-methylnaphthalene
  17. 2-nitroaniline\*
  18. 4-chloro-3-methylphenol\*
  19. 4-nitrophenol\*
  20. acenaphthylene\*

#### Note:

- a) The twelve constituents which are starred (\*) were not detected in GW over the timeframe used for Table 1.
- b) Several constituents had detection limits (DLs) which were considerably higher than their screening levels. Please comment on this within your response to this section.

- It is not clear whether the groundwater has been sampled for EDB, MTBE, n-hexane, or VPH/EPH. If not, a data gap (for completing the GW COPC screening) may exist.
- As we have discussed, the LNAPL needs to be sampled and analyzed. Although it is likely that many constituents associated with the LNAPL have already dissolved into groundwater, and may have reached their maximum or "steady state" dissolved-phase concentrations by now, this hypothesis should be tested by sampling/analysis. Before the groundwater COPC screening can be considered complete, Ecology requires better information concerning the present composition of the NAPL. Ecology is willing to work with the PLPs in determining how best to reach this goal.